REMARKS

In the Official Action mailed on **3 April 2007** the Examiner reviewed claims 1-3, 5, 6, 12, 13, 15, 16, and 32. Claims 1-3, 5, 6, 12, 13, 15, 16, and 32 were rejected under 35 U.S.C. § 102(e) as being anticipated by Erickson et al. (USPN 6,892,210 hereinafter "Erickson").

Rejections under 35 U.S.C. § 102(e)

Applicant has cancelled claims 1-34 without prejudice. Applicant has added claims 35-55, which are based on the original claims as filed, with the following amendments.

Applicant points out that none of the prior art references cited in the present and past Office Action letters, separately or in concert, disclose the present invention.

Jones (USPN 5,684,984)

Applicant points out that Jones discloses a system which synchronizes database objects between a plurality of sites (see Jones column 2, lines 2-19). However, the system of Jones **requires that only one site be able to modify any given object** (see Jones column 7, lines 52-60). Thus, in the system of Jones, an object is designated as belonging to a given site (see Jones column 7, lines 54-55). Note that this is *the principal of operation* of the invention of Jones.

In contrast, the present invention allows clients to **perform database operations on any objects within the database** (see FIG. 1; page 4, lines 13-24; page 6, lines 3-7; and page 6, lines 28-30 of the instant application). Specifically, this is recited in the claim limitation: "wherein the objects are included in a database; and wherein one or more of the first system and the one or more systems can perform database operations on a given object within the database."

There is nothing in Jones which suggests that one or more of the first system and the one or more systems can perform database operations on a given

object within the database. Furthermore, Jones teaches away from this claim limitation by requiring that each object in the database be assigned to a single site/client.

Since Jones does not teach every claim limitation, it cannot be used as a basis for a §102 or a §103(a) rejection. MPEP §§2131.

Rothrock (USPN 5,408,470)

Applicant points out that Rothrock discloses a system which synchronizes objects between a plurality of agents in an electronic conferencing system (see Rothrock column 2, lines 2-19). However, the system of Rothrock **requires that an agent making a change to an object first request an object index** from an arbitrator in order to synchronize itself with the other agents in the electronic conference system (see Rothrock column 2, line 66 to column 3, lines 14; column 11, lines 14-47; and FIGs. 6a-6b). Only after requesting and receiving the object index from the arbitrator can the agent making the change broadcast the change to other agents (see Rothrock FIG. 6a – steps 610-612). Note that this is the principle of operation of the Rothrock system.

In contrast, in the present invention, a client can make changes to objects within a database system, determine a change set, and distribute these changes **without requesting an object index from the database** so that the client is synchronized with the database (see FIG. 3; page 6, line 31 to page 7 line 30 of the instant application). Instead, these changes are *received whenever changes are made to the objects by other clients* (see FIG. 3, steps 308-309; and page 7, lines 16-19 of the instant application).

Thus, the invention disclosed by Rothrock **is not the same** as the present invention.

Zhu (USPN 6,792,436)

Applicant points out that Zhu discloses a system which synchronizes objects by **sending a full object state** (see Zhu column 6, lines 12-28; and

column 8, lines 18-20). Note that this is the principle of operation of the Zhu system.

In contrast, the present invention determines and distributes **object change information** (see page 7, line 31 to page 8, line 4; page 8, lines 14-15; and page 12, lines 7-10 of the instant application).

There is nothing in Zhu which suggests determining and distributing *object change information*. Thus, the invention of Zhu is not the same as the present invention.

Erickson (USPN 6,892,210)

Erickson is similar to Jones in that objects are owned by specific computer systems, **wherein changes are propagated by the computer system that owns the object**. In Jones, a Sync Computer owns a given Sync Record (see Erickson column 4, lines 40-43; and column 4, lines 48-53). Furthermore, the Sync Computer distributes the changes to other computer systems (see Erickson column 9, line 45 to column 10, line 27; column 9, lines 31-67; and FIGs. 2A-2B).

In contrast, the present invention allows clients to **perform database operations on any objects within the database** (see FIG. 1; page 4, lines 13-24; page 6, lines 3-7; and page 6, lines 28-30 of the instant application). Specifically, this is recited in the claim limitation: "wherein the objects are included in a database; and wherein one or more of the first system and the one or more systems can perform database operations on a given object within the database." Furthermore, **the client making the change distributes the change to the other systems** (see page 7, lines 16-19; and FIG. 3 of the instant application).

There is nothing in Erickson which suggests that one or more of the first system and the one or more systems can perform database operations on a given object within the database. Furthermore, Erickson does not teach distributing the changes made by the client to one or more systems.

Hence, Applicant respectfully submits that independent claims 35, 46, and 55 as presented are in condition for allowance. Applicant also submits that claims 36-45, which depend upon claim 35, and claims 47-54, which depend upon claim 46, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

CONCLUSION

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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